

**Commonwealth of Kentucky
Natural Resources and Environmental Protection Cabinet
Department for Environmental Protection
Division for Air Quality
803 Schenkel Lane
Frankfort, Kentucky 40601
(502) 573-3382**

AIR QUALITY PERMIT

Permittee Name: Eagle Industries, Inc.
Mailing Address: 601 Double Spring Road, P. O. Box 9697,
Bowling Green, Kentucky 42101

Source Name: Eagle Industries, Inc.
Mailing Address: 601 Double Spring Road, P. O. Box 9697,
Bowling, Kentucky 42101

Source Location: 610 Hope Street and 1040 West Main Street
Bowling, Kentucky 42101

Permit Type: Federally-Enforceable
Review Type: Synthetic Minor, Title V
Permit Number: V-00-013
Log Number: G563 and G564
**Application
Complete Date:** 3/13/00

KYEIS ID #: 105-3960-0096
AFS Plant ID #: 21-227-00096
SIC Code: 2511

Region: Bowling Green
County: Warren

Issuance Date:
Revision Date:
Expiration Date:

**John E. Hornback, Director
Division for Air Quality**

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SECTION A - PERMIT AUTHORIZATION

Pursuant to a duly submitted application which was determined to be complete on March 13, 2000 the Kentucky Division for Air Quality hereby authorizes the construction and operation of the equipment described herein in accordance with the terms and conditions of this permit. This permit has been issued under the provisions of Kentucky Revised Statutes Chapter 224 and regulations promulgated pursuant thereto

The permittee shall not construct, reconstruct, or modify any affected facilities without first having submitted a complete application and receiving a permit for the planned activity from the permitting authority, except as provided in this permit or in the Regulation 401 KAR 50:035, Permits.

Issuance of this permit does not relieve the permittee from the responsibility of obtaining any other permits, licenses, or approvals required by this Cabinet or any other federal, state, or local agency.

**LINE 1
HOPE STREET FINISHING**

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS

01 (1-H, 2-H, 3-H, 4-H, 5-H, 6-H, 7-H)

Stain spray booth
Sanding sealer spray booth
Topcoat spray booth
Stain spray booth
Stain spray booth
Sanding sealer spray booth
Topcoat spray booth
Drying oven for stain and sealer
Drying oven for topcoat

Description:

Hope Street Finishing Line consists of seven spray booths 1H-7H each having dry filters with a particulate control efficiency of 95%.

Construction Dates: 1-H, 3-H, 5-H, 7-H- 9/1993; 2-H, 4-H, 6-H-11/1995

APPLICABLE REGULATIONS:

40 CFR 63 Subpart JJ, National Emission Standards for Wood Furniture Manufacturing Operations (Applicable to major wood furniture manufacturing sources). Emission point #1 is an existing source.

401 KAR 59:010, New Process Operations (Applicable to each affected facility commenced on or after July 2, 1975).

1. **Operating Limitation:** See group requirements

2. **Emission Limitations:**

401 KAR 59:010, Section 3, The permittee shall not cause, suffer, allow, or permit any continuous emission into the open air from a control device or stack associated with any affected facility which is equal to or greater than twenty (20) percent opacity.

401 KAR 59:010, Section 3: The permittee shall not cause, suffer, allow or permit the emission into open air of particulate matter from any affected facility, control device or stack of more than 2.34 pound per hour.

Voluntary, as a condition for synthetic minor classification: Volatile organic compound (VOC) emissions shall be less than 249 tons per rolling 12 month period.

40 CFR 63.802: Emission limit under **Subpart JJ:** See group requirements

Compliance Demonstration: See group requirements

3. **Testing Requirements:** None

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

4. **Specific Monitoring Requirements:** See group requirements

5. **Specific Record Keeping Requirements:** See group requirements.

6. **Specific Reporting Requirements:** See group requirements.

7. **Specific Control Equipment Operating Conditions:**

Exhaust filters shall be in place at all times when booth is operating and shall be changed as often as needed to comply with the emission limitations.

8. **Alternate Operating Scenarios:** None

9. **Compliance Schedule:** None

10. **Compliance Certification Requirements:** See group requirements.

**SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE
REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)**

**LINE 2
CURIO FINISHING LINE**

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

Emission point **02 (1-C, 2-C and 3-C)**
 Stain spray booth
 Sanding sealer spray booth
 Topcoat spray booth

Description: Curio Finishing Line consists of three spray booths 1C-3C each having dry filters with a particulate control efficiency of 95%.

Construction Dates: 6 /1998

APPLICABLE REGULATIONS:

40 CFR 63 Subpart JJ, National Emission Standards for Wood Furniture Manufacturing Operations (Applicable to major wood furniture manufacturing sources). Emission point #2 is a new source.

401 KAR 59:010, New Process Operations (Applicable to each affected facility commenced on or after July 2, 1975).

1. **Operating Limitations:** See group requirements

2. **Emission Limitations:**

401 KAR 59:010, Section 3: The permittee shall not cause, suffer, allow, or permit any continuous emission into the open air from a control device or stack associated with any affected facility which is equal to or greater than twenty (20) percent opacity.

401 KAR 59:010, Section 3, Appendix A: The permittee shall not cause, suffer, allow or permit the emission into open air of particulate matter from any affected facility, control device or stack of more than 2.34 pound per hour.

Voluntary, as a condition for synthetic minor classification: Volatile organic compound (VOC) emissions shall be less than 39 tons per rolling 12 month period.

40 CFR 63.802: Emission limit under **Subpart JJ:** See group requirements

Compliance Demonstration: See group requirements.

3. **Testing Requirements:** None

4. **Specific Monitoring Requirements:** None

5. **Specific Recordkeeping Requirements:** See group requirements

6. **Specific Reporting Requirements:** See group requirements

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

7. Specific Control Equipment Operating Conditions:

Exhaust filters shall be in place at all times when booth is operating and shall be changed as often as needed to comply with the emission limitations.

8. Alternate Operating Scenarios: None

9. Compliance Schedule: None

10. Compliance Certification Requirements: See group requirements.

**SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE
REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)**

**LINE 3
DC FINSHING LINE**

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

Emission point # 03 (1-D, 2-D, 3-D, 4-D, 5-D, 6-D, 7-D)

Stain spray booth
Sanding sealer spray booth
Topcoat spray booth
Stain spray booth
Sanding sealer spray booth
Sanding sealer spray booth
Topcoat spray booth
Drying ovens

Description:

DC Finishing Line consists of seven spray booths 1D-7D. Each booth except 4D is equipped with dry filters with a particulate control efficiency of 95%. Booth 4D is equipped with water curtain with a particulate control efficiency of 98%.

Construction Dates: 1-D, 2-D, 3-D 9/1997; 4-D, 5-D, 6-D, 7-D 6/2000

APPLICABLE REGULATIONS:

40 CFR 63 Subpart JJ, National Emission Standards for Wood Furniture Manufacturing Operations (Applicable to major wood furniture manufacturing sources). Emission point #3 is a new source.

401 KAR 59:010, New Process Operations (Applicable to affected facilities commenced on or after July 2, 1975).

1. **Operating Limitation:** See group requirements

2. **Emission Limitations:**

401 KAR 59:010, Section 3, The permittee shall not cause, suffer, allow, or permit any continuous emission into the open air from a control device or stack associated with any affected facility which is equal to or greater than twenty (20) percent opacity.

401 KAR 59:010, Section 3: The permittee shall not cause, suffer, allow or permit the emission into open air of particulate matter from each affected facility, control device or stack of more than 2.34 pound per hour.

Voluntary, as a condition for synthetic minor classification: Volatile organic compound (VOC) emissions shall be less than 249 tons per rolling 12 month period.

40 CFR 63.802: Emission limit under **Subpart JJ:** See group requirements

Compliance Demonstration: See group requirements

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

3. **Testing Requirements:** None
4. **Specific Monitoring Requirements:** None
5. **Specific Record Keeping Requirements:** See group requirements.
6. **Specific Reporting Requirements:** See group requirements.
7. **Specific Control Equipment Operating Conditions:**

Exhaust filters shall be in place at all times when booth is operating and shall be changed as often as needed to comply with the emission limitations. Pressure drop for the water curtain must be maintained per manufacturer's recommendations.
8. **Alternate Operating Scenarios:** None
9. **Compliance Schedule:** None
10. **Compliance Certification Requirements:** See group requirements.

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

GROUP REQUIREMENTS:

LIST of POINTS (01, 02 and 03)

01 Line 1-Hope Street Finishing Line

02 Line 2-Curio Finishing Line

03 Line 3-DC Finishing Line

APPLICABLE REGULATIONS:

40 CFR 63 **Subpart JJ**, National Emission Standards for Wood Furniture Manufacturing Operations

Existing source- Emission Point # 1

New source- Emission point # 2 and #3

1. Operating Limitations:

Sec. 63.803 Work practice standards.

Work practice implementation plan. The permittee shall prepare and maintain a written work practice implementation plan that defines environmentally desirable work practices for each wood furniture manufacturing operation and addresses each of the work practice standards presented in paragraphs (B) through (L) of this section. The plan shall be developed no more than 60 days after the compliance date. The written work practice implementation plan shall be available for inspection by the Division for Air Quality (DAQ) upon request. If the DAQ determines that the work practice implementation plan does not adequately address each of the topics specified in paragraphs (B) through (L) of this section or that the plan does not include sufficient mechanisms for ensuring that the work practice standards are being implemented, the DAQ may require the affected source to modify the plan. Revisions or modifications to the plan do not require a revision of the source's Title V permit.

Operator training course. The permittee shall train all new and existing personnel, including contract personnel, who are involved in finishing, gluing, cleaning, and washoff operations, use of manufacturing equipment, or implementation of the requirements of **subpart JJ**. All new personnel, those hired after the compliance date of the standard, shall be trained upon hiring. All existing personnel, those hired before the compliance date of the standard, shall be trained within six months of the compliance date of the standard. All personnel shall be given refresher training annually. The affected source shall maintain a copy of the training program with the work practice implementation plan. The training program shall include, at a minimum, the following:

- (1) A list of all current personnel by name and job description that are required to be trained;
- (2) An outline of the subjects to be covered in the initial and refresher training for each position or group of personnel;

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

- (3) Lesson plans for courses to be given at the initial and the annual refresher training that include, at a minimum, appropriate application techniques, appropriate cleaning and washoff procedures, appropriate equipment setup and adjustment to minimize finishing material usage and overspray, and appropriate management of cleanup wastes; and
 - (4) A description of the methods to be used at the completion of initial or refresher training to demonstrate and document successful completion.
- C. **Inspection and maintenance plan.** The permittee shall prepare and maintain with the work practice implementation plan a written leak inspection and maintenance plan that specifies:
 - (5) A minimum visual inspection frequency of once per month for all equipment used to transfer or apply coatings, adhesives, or organic HAP solvents;
 - (6) An inspection schedule;
 - (7) Methods for documenting the date and results of each inspection and any repairs that were made;
 - (8) The timeframe between identifying the leak and making the repair, which adheres, at a minimum, to the following schedule:
 - (i) A first attempt at repair (e.g., tightening of packing glands) shall be made no later than five calendar days after the leak is detected; and
 - (ii) Final repairs shall be made within 15 calendar days after the leak is detected, unless the leaking equipment is to be replaced by a new purchase, in which case repairs shall be completed within three months.
- D. **Cleaning and washoff solvent accounting system.** The permittee shall develop an organic HAP solvent accounting form to record:
 - (1) The quantity and type of organic HAP solvent used each month for washoff and cleaning;
 - (2) The number of pieces washed off, and the reason for the washoff; and
 - (3) The quantity of spent organic HAP solvent generated from each washoff and cleaning operation each month, and whether it is recycled onsite or disposed offsite.
- E. **Chemical composition of cleaning and washoff solvents.** The permittee shall not use cleaning or washoff solvents that contain any of the pollutants listed in Table 4 to this **subpart JJ**, in concentrations subject to MSDS reporting as required by OSHA.
- F. **Spray booth cleaning.** The permittee shall not use compounds containing more than 8.0 percent by weight of VOC for cleaning spray booth components other than conveyors, continuous coaters and their enclosures, or metal filters, or plastic filters unless the spray booth is being refurbished. If the spray booth is being refurbished, that is the spray booth coating or other protective material used to cover the booth is being replaced, the affected source shall use no more than 1.0 gallon of organic HAP solvent per booth to prepare the surface of the booth prior to applying the booth coating.

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

- G. **Storage requirements.** The permittee shall use normally closed containers for storing finishing, gluing, cleaning, and washoff materials.
- H. **Application equipment requirements.** The permittee shall use conventional air spray guns to apply finishing materials only under any of the following circumstances:
- (4) To apply finishing materials that have a VOC content no greater than 1.0 lb VOC/lb solids, as applied;
 - (2) For touchup and repair under the following conditions:
 - (i) The touchup and repair occurs after completion of the finishing operation; or
 - (ii) The touchup and repair occurs after the application of stain and before the application of any other type of finishing material, and the materials used for touchup and repair are applied from a container that has a volume of no more than 2.0 gallons.
 - (3) The conventional air gun is used to apply finishing materials and the cumulative total usage of that finishing material is no more than 5.0 percent of the total gallons of finishing material used during that semiannual period.
- I. **Line cleaning.** The permittee shall pump or drain all organic HAP solvent used for line cleaning into a normally closed container.
- J. **Gun cleaning.** The permittee shall collect all organic HAP solvent used to clean spray guns into a normally closed container.
- K. **Washoff operations.** The permittee shall control emissions from washoff operations by:
- (1) Using normally closed tanks for washoff; and
 - (2) Minimizing dripping by tilting or rotating the part to drain as much solvent as possible.
- L. **Formulation assessment plan for finishing operations.** The permittee shall prepare and maintain with the work practice implementation plan a formulation assessment plan that:
- (3) Identifies VHAP from the list presented in Table 5 of **subpart JJ** that are being used in finishing operations by the affected source;
 - (4) Establishes a baseline level of usage by the affected source, for each VHAP identified in paragraph (L)(1) of this section. The baseline usage level shall be the highest annual usage from 1994, 1995, or 1996, for each VHAP identified in paragraph (L)(1) of this section.
 - (5) Tracks the annual usage of each VHAP identified in (L)(1) by the affected source that is present in amounts subject to MSDS reporting as required by OSHA.
 - (6) If, after November 1998, the annual usage of the VHAP identified in paragraph (L)(1) exceeds its baseline level, then the owner or operator of the affected source shall provide a written notification to the permitting authority that describes the amount of the increase and explains the reasons for exceedance of the baseline level. The following explanations would relieve the from further action, unless the affected source is not in compliance with any State regulations or requirements for that VHAP:

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

- (i) The exceedance is no more than 15.0 percent above the baseline level;
- (ii) The affected source is in compliance with its State's air toxic regulations or guidelines for the VHAP; or
- (iii) The source of the pollutant is a finishing material with a VOC content of no more than 1.0 kg VOC/kg solids (1.0 lb VOC/lb solids), as applied.

2. Emission Limitations: 40 CFR 63:802

A. For the **existing affected source** the permittee shall:

- (1) Limit VHAP emissions from finishing operations by meeting the emission limitations for existing sources presented in Table 3 of this **subpart JJ**, using any of the compliance methods in Sec. 63.804(a).
- (2) Limit VHAP emissions from contact adhesives by achieving a VHAP limit for contact adhesives based on the following criteria:
For all contact adhesives applied to nonporous substrates, the VHAP content of the adhesive shall not exceed 1.0 kg VHAP/kg solids (1.0 lb VHAP/lb solids), as applied.
- (3) Limit HAP emissions from strippable spray booth coatings by using coatings that contain no more than 0.8 kg VOC/kg solids (0.8 lb VOC/lb solids), as applied.

B. For the **new affected source** the permittee shall:

- (3) Limit VHAP emissions from finishing operations by meeting the emission limitations for new sources presented in Table 3 of this **subpart JJ** using any of the compliance methods in Sec. 63.804(d).
- (4) Limit VHAP emissions from contact adhesives by achieving a VHAP limit for contact adhesives, excluding aerosol adhesives and excluding contact adhesives applied to nonporous substrates, of no greater than 0.2 kg VHAP/kg solids (0.2 lb VHAP/lb solids).
- (5) Limit HAP emissions from strippable spray booth coatings by using coatings that contain no more than 0.8 kg VOC/kg solids (0.8 lb VOC/lb solids), as applied.

Compliance Demonstration

Sec. 63.804 Compliance procedures and monitoring requirements.

A. For the **existing affected source** the permittee shall comply with those provisions using any of the methods presented in Sec. 63.804.

- (1) Calculate the average VHAP content for all finishing materials used at the facility using Equation 1, and maintain a value of E no greater than 1.0;

$$E = \frac{(M_{c1}C_{c1} + M_{c2}C_{c2} + \text{*****} + M_{cn}C_{cn} + S_1W_1 + S_2W_2 + \text{*****} + S_nW_n)}{(M_{c1} + M_{c2} + \text{*****} + M_{cn})}$$

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

(2) Use compliant finishing materials according to the following criteria:

- (i) Demonstrate that each stain, sealer, and topcoat has a VHAP content of no more than 1.0 kg VHAP/kg solids (1.0 lb VHAP/lb solids), as applied, and each thinner contains no more than 10.0 percent VHAP by weight by maintaining certified product data sheets for each coating and thinner;
- (ii) Demonstrate that each washcoat, basecoat, and enamel that is purchased pre-made, that is, it is not formulated onsite by thinning another finishing material, has a VHAP content of no more than 1.0 kg VHAP/kg solids (1.0 lb VHAP/lb solids), as applied, and each thinner contains no more than 10.0 percent VHAP by weight by maintaining certified product data sheets for each coating and thinner; and
- (iii) Demonstrate that each washcoat, basecoat, and enamel that is formulated at the affected source is formulated using a finishing material containing no more than 1.0 kg VHAP/kg solids (1.0 lb VHAP/lb solids) and a thinner containing no more than 3.0 percent VHAP by weight.

B. For the **new affected source** the permittee may comply with those provisions by using any of the following methods:

- (1) Calculate the average VHAP content across all finishing materials used at the facility using Equation 1, and maintain a value of E no greater than 0.8;
- (2) Use compliant finishing materials according to the following criteria:
 - (i) Demonstrate that each sealer and topcoat has a VHAP content of no more than 0.8 kg VHAP/kg solids (0.8 lb VHAP/lb solids), as applied, each stain has a VHAP content of no more than 1.0 kg VHAP/kg solids (1.0 lb VHAP/lb solids), as applied, and each thinner contains no more than 10.0 percent VHAP by weight;
 - (ii) Demonstrate that each washcoat, basecoat, and enamel that is purchased pre-made, that is, it is not formulated onsite by thinning another finishing material, has a VHAP content of no more than 0.8 kg VHAP/kg solids (0.8 lb VHAP/lb solids), as applied, and each thinner contains no more than 10.0 percent VHAP by weight;
 - (iii) Demonstrate that each washcoat, basecoat, and enamel that is formulated onsite is formulated using a finishing material containing no more than 0.8 kg VHAP/kg solids (0.8 lb VHAP/lb solids) and a thinner containing no more than 3.0 percent HAP by weight.

C. For the **new affected source** subject to Sec. 63.802(b)(2) the permittee shall comply with the provisions using the following methods:

Use compliant contact adhesives with a VHAP content no greater than 0.2 kg VHAP/kg solids (0.2 lb VHAP/lb solids), as applied.

D. Initial compliance.

- (1) The permittee shall submit the results of the averaging calculation (Equation 1) for the first month with the initial compliance status report required by Sec. 63.807. The first month's calculation shall include data for the entire month in which the compliance date falls.

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

- (2) The permittee shall submit an initial compliance status report, as required by Sec. 63.807, stating that compliant stains, washcoats, sealers, topcoats, basecoats, enamels, and thinners, as applicable, are being used by the affected source.
- E. **Continuous compliance demonstrations.** The permittee shall demonstrate continuous compliance by submitting the results of the averaging calculation (Equation 1) for each month within that semiannual period and submitting a compliance certification with the semiannual report required by Sec. 63.807.
- (i) The compliance certification shall state that the value of (E), as calculated by Equation 1, is no greater than 1.0 for existing sources or 0.8 for new sources. An affected source is in violation of the standard if E is greater than 1.0 for existing sources or 0.8 for new sources for any month. A violation of the monthly average is a separate violation of the standard for each day of operation during the month, unless the affected source can demonstrate through records that the violation of the monthly average can be attributed to a particular day or days during the period.
- (ii) The compliance certification shall be signed by a responsible official of the company that owns or operates the affected source.

5. Specific Record Keeping Requirements: 40 CFR 63.806

- A. The permittee shall maintain records of the following:
- (1) A certified product data sheet for each finishing material, thinner, contact adhesive, and strippable spray booth coating subject to the emission limits in the Item 2; and
- (2) The VHAP content, in kg VHAP/kg solids (lb VHAP/lb solids), as applied, of each finishing material and contact adhesive subject to the emission limits in Item 2; and
- (3) The VOC content, in kg VOC/kg solids (lb VOC/lb solids), as applied, of each strippable booth coating subject to the emission limits in the Item 2.
- B. The permittee shall maintain copies of the averaging calculation for each month following the compliance date, as well as the data on the quantity of coatings and thinners used that is necessary to support the calculation of E in Equation 1.
- C. The permittee shall maintain onsite the work practice implementation plan and all records associated with fulfilling the requirements of that plan, including, but not limited to:
- (4) Records demonstrating that the operator training program required by Item 1 is in place;
- (5) Records collected in accordance with the inspection and maintenance plan required by Item 1.
- (6) Records associated with the cleaning solvent accounting system required by Item 1;
- (7) Records associated with the limitation on the use of conventional air spray guns showing total finishing material usage and the percentage of finishing materials applied with conventional air spray guns for each semiannual period as required by Item 1.
- (8) Records associated with the formulation assessment plan required by Item 1; and
- (9) Copies of documentation such as logs developed to demonstrate that the other provisions of the work practice implementation plan are followed.
- D. The permittee shall maintain records of the compliance certifications submitted in accordance with Item 2 for each semiannual period following the compliance date.

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

6. Specific Reporting Requirements: 40 CFR 63.807

No later than 60 days after startup

- A. 40 CFR 63.804, **INITIAL COMPLIANCE STATUS REPORT:** Stating that the work practice implementation plan has been developed and procedures have been established for implementing the provisions of the plan.

Within 30 calendar days after the end of the first six month period of operation, and each six months thereafter

- B. 40 CFR 63.804, **COMPLIANCE CERTIFICATION** signed by a responsible official of the company that owns or operates the affected source to include:
- (1) Statement that compliant stains, washcoats, sealers, topcoats, basecoats, enamels, and thinners, as applicable have been used each day in the semiannual reporting period or should otherwise identify the periods of noncompliance and the reasons for noncompliance.
 - (2) Statement that the work practice implementation plan is being followed, or should otherwise identify the provisions of the plan that have not been implemented and each day the provisions were not implemented. During any period of time that an owner or operator is required to implement the provisions of the plan, each failure to implement an obligation under the plan during any particular day is a violation.
 - (3) Statement of whether or not the affected source was in compliance, and if not, what measures were taken to bring the affected source in compliance.
- C. These Conditions 1, 5, and 6 (Operating limitations, Record keeping, and Reporting) are intended to convey the requirements of 40 CFR Part 63, Subpart JJ, as applicable to the affected facilities permitted herein. This does not release the owner \ operator of this source from responsibility for any requirements of Subpart JJ. not specifically stated in this permit.

SECTION C - INSIGNIFICANT ACTIVITIES

The following listed activities have been determined to be insignificant activities for this source pursuant to Regulation 401 KAR 50:035, Section 5(4). While these activities are designated as insignificant the permittee must comply with the applicable regulation and some minimal level of periodic monitoring may be necessary.

DescriptionGenerally Applicable Regulation**Hope Street Plant:**

- | | |
|-----------------------|----------------|
| 1. Cutting / assembly | 59:010, 63:010 |
| 2. Hand sanding | 59:010, 63:010 |
| 3. Panels Glue | NA |
| 4. Wood putty | NA |
| 5. Wood polish | NA |
| 6. Glass cutting | NA |
| 7. Natural Gas heater | 59:015 |

Main Street Plant:

- | | |
|-----------------------|----------------|
| 1. Cutting / assembly | 59:010, 63:010 |
| 2. Hand sanding | 59:010, 63:010 |
| 3. Panels Glue | NA |
| 4. Wood putty | NA |
| 5. Wood polish | NA |
| 6. Glass cutting | NA |
| 7. Natural Gas heater | 59:015 |

SECTION D - SOURCE EMISSION LIMITATIONS AND TESTING REQUIREMENTS

1. Compliance with annual emission and processing limitations imposed pursuant to 401 KAR 50:035, Section 7(1)(a), and contained in this permit, shall be based on emissions and processing rates for any twelve (12) consecutive months.
 - A. Volatile organic compound (VOC) emissions shall not exceed 39 tons per rolling 12 months period for the Curio Finishing Line.
 - B. Volatile organic compound (VOC) emissions shall not exceed 249 tons per rolling 12 months period for the DC Finishing Line.

SECTION E - SOURCE CONTROL EQUIPMENT REQUIREMENTS

Pursuant to 401 KAR 50:055, Section 2(5), at all times, including periods of startup, shutdown and malfunction, owners and operators shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the division which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.

SECTION F - MONITORING, RECORD KEEPING, AND REPORTING REQUIREMENTS

1. When continuing compliance is demonstrated by periodic testing or instrumental monitoring, the permittee shall compile records of required monitoring information that include:
 - a. Date, place as defined in this permit, and time of sampling or measurements.
 - b. Analyses performance dates;
 - c. Company or entity that performed analyses;
 - d. Analytical techniques or methods used;
 - e. Analyses results; and
 - f. Operating conditions during time of sampling or measurement;
2. Records of all required monitoring data and support information, including calibrations, maintenance records, and original strip chart recordings, and copies of all reports required by the Division for Air Quality, shall be retained by the permittee for a period of five years and shall be made available for inspection upon request by any duly authorized representative of the Division for Air Quality. [401 KAR 50:035, Permits, Section 7(1)(d)2 and 401 KAR 50:035, Permits, Section 7(2)(c)]
3. In accordance with the requirements of Regulation 401 KAR 50:035, Permits, Section 7(2)(c) the permittee shall allow the Cabinet or authorized representatives to perform the following:
 - a. Enter upon the premises where a source is located or emissions-related activity is conducted, or where records are kept;
 - b. Have access to and copy, at reasonable times, any records required by the permit:
 - i. During normal office hours, and
 - ii. During periods of emergency when prompt access to records is essential to proper assessment by the Cabinet;
 - c. Inspect, at reasonable times, any facilities, equipment (including monitoring and pollution control equipment), practices, or operations required by the permit. Reasonable times shall include, but are not limited to the following:
 - i. During all hours of operation at the source,
 - ii. For all sources operated intermittently, during all hours of operation at the source and the hours between 8:00 a.m. and 4:30 p.m., Monday through Friday, excluding holidays, and
 - iii. During an emergency; and
 - d. Sample or monitor, at reasonable times, substances or parameters to assure compliance with the permit or any applicable requirements. Reasonable times shall include, but are not limited to the following:
 - i. During all hours of operation at the source,
 - ii. For all sources operated intermittently, during all hours of operation at the source and the hours between 8:00 a.m. and 4:30 p.m., Monday through Friday, excluding holidays, and
 - iii. During an emergency.
4. No person shall obstruct, hamper, or interfere with any Cabinet employee or authorized representative while in the process of carrying out official duties. Refusal of entry or access may constitute grounds for permit revocation and assessment of civil penalties.

SECTION F - MONITORING, RECORD KEEPING, AND REPORTING REQUIREMENTS (CONTINUED)

5. Reports of any monitoring required by this permit shall be reported to the division's Bowling Green Regional Office no later than the six-month anniversary date of this permit and every six months thereafter during the life of this permit, unless otherwise stated in this permit. The permittee may shift to semi-annual reporting on a calendar year basis upon approval of the regional office. If calendar year reporting is approved, the semi-annual reports are due January 30th and July 30th of each year. All reports shall be certified by a responsible official pursuant to Section 6(1) of Regulation 401 KAR 50:035, Permits. All deviations from permit requirements shall be clearly identified in the reports.
6.
 - a. In accordance with the provisions of Regulation 401 KAR 50:055, Section 1 the owner or operator shall notify the Division for Air Quality's Bowling Green Regional Office concerning startups, shutdowns, or malfunctions as follows:
 1. When emissions during any planned shutdowns and ensuing startups will exceed the standards notification shall be made no later than three (3) days before the planned shutdown, or immediately following the decision to shut down, if the shutdown is due to events which could not have been foreseen three (3) days before the shutdown.
 2. When emissions due to malfunctions, unplanned shutdowns and ensuing startups are or may be in excess of the standards notification shall be made as promptly as possible by telephone (or other electronic media) and shall cause written notice upon request.
 - b. In accordance with the provisions of Regulation 401 KAR 50:035, Section 7(1)(e)2, the owner or operator shall report emission related exceedances from permit requirements including those attributed to upset conditions (other than emission exceedances covered by general condition 6 a. above) to the Division for Air Quality's Bowling Green Regional Office within 30 days. Other deviations from permit requirements shall be included in the semiannual report required by general condition F.5.
7. Pursuant to Regulation 401 KAR 50:035, Permits, Section 7(2)(b), the permittee shall certify compliance with the terms and conditions contained in this permit, annually on the permit issuance anniversary date or by January 30th of each year if calendar year reporting is approved by the regional office, by completing and returning a Compliance Certification Form (DEP 7007CC) (or an approved alternative) to the Division for Air Quality's Bowling Green Regional Office and the U.S. EPA in accordance with the following requirements:
 - a. Identification of each term or condition of the permit that is the basis of the certification;
 - b. The compliance status regarding each term or condition of the permit;
 - c. Whether compliance was continuous or intermittent; and
 - d. The method used for determining the compliance status for the source, currently and over the reporting period, pursuant to 401 KAR 50:035, Section 7(1)(c),(d), and (e).

SECTION F - MONITORING, RECORD KEEPING, AND REPORTING REQUIREMENTS (CONTINUED)

- e. The certification shall be postmarked by the thirtieth (30) day following the applicable permit issuance anniversary date, or by January 30th of each year if calendar year reporting is approved by the regional office. **Annual compliance certifications should be mailed to the following addresses:**

**Division for Air Quality
Bowling Green Regional Office
1508 Western Avenue
Bowling Green, KY 42104**

**U.S. EPA Region IV
Atlanta Federal Center
61 Forsyth St.
Atlanta, GA 30303-8960**

**Division for Air Quality
Central Files
803 Schenkel Lane
Frankfort, KY 40601**

8. In accordance with Regulation 401 KAR 50:035, Section 23, the permittee shall provide the division with all information necessary to determine its subject emissions within thirty (30) days of the date the KEIS emission report is mailed to the permittee.
9. Pursuant to Section VII.3 of the policy manual of the Division for Air Quality as referenced by Regulation 401 KAR 50:016, Section 1(1), results of performance test(s) required by the permit shall be submitted to the division by the source or its representative within forty-five days after the completion of the fieldwork.

SECTION G - GENERAL CONDITIONS

(a) General Compliance Requirements

1. The permittee shall comply with all conditions of this permit. A noncompliance shall be (a) violation(s) of state regulation 401 KAR 50:035, Permits, Section 7(3)(d) and for federally enforceable permits is also a violation of Federal Statute 42 USC 7401 through 7671q (the Clean Air Act) and is grounds for enforcement action including but not limited to the termination, revocation and reissuance, or revision of this permit.
2. The filing of a request by the permittee for any permit revision, revocation, reissuance, or termination, or of a notification of a planned change or anticipated noncompliance, shall not stay any permit condition.
3. This permit may be revised, revoked, reopened and reissued, or terminated for cause. The permit will be reopened for cause and revised accordingly under the following circumstances:
 - a. If additional applicable requirements become applicable to the source and the remaining permit term is three (3) years or longer. In this case, the reopening shall be completed no later than eighteen (18) months after promulgation of the applicable requirement. A reopening shall not be required if compliance with the applicable requirement is not required until after the date on which the permit is due to expire, unless this permit or any of its terms and conditions have been extended pursuant to Regulation 401 KAR 50:035, Section 12(2)(c);
 - b. The Cabinet or the U. S. EPA determines that the permit must be revised or revoked to assure compliance with the applicable requirements;
 - c. The Cabinet or the U. S. EPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit;If any additional applicable requirements of the Acid Rain Program become applicable to the source.

Proceedings to reopen and reissue a permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of the permit for which cause to reopen exists. Reopenings shall be made as expeditiously as practicable. Reopenings shall not be initiated before a notice of intent to reopen is provided to the source by the division, at least thirty (30) days in advance of the date the permit is to be reopened, except that the division may provide a shorter time period in the case of an emergency.

4. The permittee shall furnish to the division, in writing, information that the division may request to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit, or to determine compliance with the permit. [401 KAR 50:035, Permits, Section 7(2)(b)3e and 401 KAR 50:035, Permits, Section 7(3)(j)]
5. The permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to the permitting authority.

SECTION G - GENERAL CONDITIONS (CONTINUED)

6. Any condition or portion of this permit which becomes suspended or is ruled invalid as a result of any legal or other action shall not invalidate any other portion or condition of this permit. [401 KAR 50:035, Permits, Section 7(3)(k)]
7. The permittee shall not use as a defense in an enforcement action the contention that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance. [401 KAR 50:035, Permits, Section 7(3)(e)]
8. Except as identified as state-origin requirements in this permit, all terms and conditions contained herein shall be enforceable by the United States Environmental Protection Agency and citizens of the United States.
9. This permit shall be subject to suspension if the permittee fails to pay all emissions fees within 90 days after the date of notice as specified in 401 KAR 50:038, Section 3(6). [401 KAR 50:035, Permits, Section 7(3)(h)]
10. Nothing in this permit shall alter or affect the liability of the permittee for any violation of applicable requirements prior to or at the time of permit issuance. [401 KAR 50:035, Permits, Section 8(3)(b)]
11. This permit shall not convey property rights or exclusive privileges. [401 KAR 50:035, Permits, Section 7 (3)(g)]
12. Issuance of this permit does not relieve the permittee from the responsibility of obtaining any other permits, licenses, or approvals required by the Kentucky Cabinet for Natural Resources and Environmental Protection or any other federal, state, or local agency.
13. Nothing in this permit shall alter or affect the authority of U.S. EPA to obtain information pursuant to Federal Statute 42 USC 7414, Inspections, monitoring, and entry. [401 KAR 50:035, Permits, Section 7(2)(b)5]
14. Nothing in this permit shall alter or affect the authority of U.S. EPA to impose emergency orders pursuant to Federal Statute 42 USC 7603, Emergency orders. [401 KAR 50:035, Permits, Section 8(3)(a)]
15. Permit Shield: Except as provided in State Regulation 401 KAR 50:035, Permits, compliance by the affected facilities listed herein with the conditions of this permit shall be deemed to be compliance with all applicable requirements identified in this permit as of the date of issuance of this permit.
16. All previously issued construction and operating permits are hereby subsumed into this permit.

SECTION G - GENERAL CONDITIONS (CONTINUED)**(b) Permit Expiration and Reapplication Requirements**

This permit shall remain in effect for a fixed term of five (5) years following the original date of issue. Permit expiration shall terminate the source's right to operate unless a timely and complete renewal application has been submitted to the division at least six months prior to the expiration date of the permit. Upon a timely and complete submittal, the authorization to operate within the terms and conditions of this permit, including any permit shield, shall remain in effect beyond the expiration date, until the renewal permit is issued or denied by the division. [401 KAR 50:035, Permits, Section 12]

(c) Permit Revisions

1. A minor permit revision procedure may be used for permit revisions involving the use of economic incentive, marketable permit, emission trading, and other similar approaches, to the extent that these minor permit revision procedures are explicitly provided for in the SIP or in applicable requirements and meet the relevant requirements of Regulation 401 KAR 50:035, Section 15.
2. This permit is not transferable by the permittee. Future owners and operators shall obtain a new permit from the Division for Air Quality. The new permit may be processed as an administrative amendment if no other change in this permit is necessary, and provided that a written agreement containing a specific date for transfer of permit responsibility coverage and liability between the current and new permittee has been submitted to the permitting authority thirty (30) days in advance of the transfer.

(d) Construction, Start-Up, and Initial Compliance Demonstration Requirements

Emission Point #3, Machine Point # 4-D, 5-D, 6-D and 7-D

1. Construction of process and/or air pollution control equipment authorized by this permit shall be conducted and completed only in compliance with the conditions of this permit.
2. Within thirty (30) days following commencement of construction, and within fifteen (15) days following start-up, and attainment of the maximum production rate specified in the permit application, or within fifteen (15) days following the issuance date of this permit, whichever is later, the permittee shall furnish to the Division for Air Quality's Bowling Green Regional Office in writing, with a copy to the division's Frankfort Central Office, notification of the following:
 - a. The date when construction commenced.
 - b. The date of start-up of the affected facilities listed in this permit.
 - c. The date when the maximum production rate specified in the permit application was achieved.

SECTION G - GENERAL CONDITIONS (CONTINUED)

3. Pursuant to State Regulation 401 KAR 50:035, Permits, Section 13(1), unless construction is commenced on or before 18 months after the date of issue of this permit, or if construction is commenced and then stopped for any consecutive period of 18 months or more, or if construction is not completed within eighteen (18) months of the scheduled completion date, then the construction and operating authority granted by this permit for those affected facilities for which construction was not completed shall immediately become invalid. Extensions of the time periods specified herein may be granted by the division upon a satisfactory request showing that an extension is justified.
4. Operation of the affected facilities for which construction is authorized by this permit shall not commence until compliance with the applicable standards specified herein has been demonstrated pursuant to 401 KAR 50:055, except as provided in Section I of this permit.
5. This permit shall allow time for the initial start-up, operation, and compliance demonstration of the affected facilities listed herein. However, within sixty (60) days after achieving the maximum production rate at which the affected facilities will be operated but not later than 180 days after initial start-up of such facilities, the permittee shall conduct a performance demonstration on the affected facilities in accordance with Regulation 401 KAR 50:055, General compliance requirements.

(e) Acid Rain Program Requirements

If an applicable requirement of Federal Statute 42 USC 7401 through 7671q (the Clean Air Act) is more stringent than an applicable requirement promulgated pursuant to Federal Statute 42 USC 7651 through 7651o (Title IV of the Act), both provisions shall apply, and both shall be state and federally enforceable.

(f) Emergency Provisions

1. An emergency shall constitute an affirmative defense to an action brought for noncompliance with the technology-based emission limitations if the permittee demonstrates through properly signed contemporaneous operating logs or other relevant evidence that:
 - a. An emergency occurred and the permittee can identify the cause of the emergency;
 - b. The permitted facility was at the time being properly operated;
 - c. During an emergency, the permittee took all reasonable steps to minimize levels of emissions that exceeded the emissions standards or other requirements in the permit; and,
 - d. The permittee notified the division as promptly as possible and submitted written notice of the emergency to the division within two working days after the time when emission limitations were exceeded due to the emergency. The notice shall meet the requirements of 401 KAR 50:035, Permits, Section 7(1)(e)2, and include a description of the emergency, steps taken to mitigate emissions, and the corrective actions taken. This requirement does not relieve the source of any other local, state or federal notification requirements.

SECTION G - GENERAL CONDITIONS (CONTINUED)

2. Emergency conditions listed in General Condition (f)1 above are in addition to any emergency or upset provision(s) contained in an applicable requirement.
3. In an enforcement proceeding, the permittee seeking to establish the occurrence of an emergency shall have the burden of proof. [401 KAR 50:035, Permits, Section 9(3)]

(g) Risk Management Provisions

1. The permittee shall comply with all applicable requirements of 40 CFR Part 68, Risk Management Plan provisions. If required, the permittee shall comply with the Risk Management Program and submit a Risk Management Plan to:
RMP Reporting Center
P.O. Box 3346
Merrifield, VA, 22116-3346
2. If requested, submit additional relevant information by the division or the U.S. EPA.

(h) Ozone depleting substances

1. The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR 82, Subpart F, except as provided for Motor Vehicle Air Conditioners (MVACs) in Subpart B:
 - a. Persons opening appliances for maintenance, service, repair, or disposal shall comply with the required practices contained in 40 CFR 82.156.
 - b. Equipment used during the maintenance, service, repair, or disposal of appliances shall comply with the standards for recycling and recovery equipment contained in 40 CFR 82.158.
 - c. Persons performing maintenance, service, repair, or disposal of appliances shall be certified by an approved technician certification program pursuant to 40 CFR 82.161.
 - d. Persons disposing of small appliances, MVACs, and MVAC-like appliances (as defined at 40 CFR 82.152) shall comply with the recordkeeping requirements pursuant to 40 CFR 82.166.

Persons owning commercial or industrial process refrigeration equipment shall comply with the leak repair requirements pursuant to 40 CFR 82.156.

Owners/operators of appliances normally containing 50 or more pounds of refrigerant shall keep records of refrigerant purchased and added to such appliances pursuant to 40 CFR 82.166.

2. If the permittee performs service on motor (fleet) vehicle air conditioners containing ozone-depleting substances, the source shall comply with all applicable requirements as specified in 40 CFR 82, Subpart B, Servicing of Motor Vehicle Air Conditioners.

SECTION H - ALTERNATE OPERATING SCENARIOS

None.

SECTION I - COMPLIANCE SCHEDULE

This section contains compliance schedule requirements as required by Kentucky Regulation 50:035, Permits, Section 7(2)(a). Progress reports (using the most current version of Form DEP7007BB) shall be submitted as required in the specific conditions outlined below. Reports shall include the following items: (a) Dates scheduled for achieving each milestone, and the actual date that compliance is achieved; and (b) An explanation of why dates in the schedule of compliance were not or will not be met, and preventive or corrective measures adopted to ensure that compliance with future items will be brought back on schedule.

The previous air permits issued to Eagle Industries will be amended to incorporate all of Eagle facilities as one source for PSD review purposes. The total emissions for all facilities shall be below PSD review thresholds, as follows:

Less than 249 tons/yr VOCs for Line #1- Hope Street Finishing
Less than 39 tons/yr VOCs for Line #2- Curio Finishing Line.
Less than 249 tons/yr VOCs for Line #3- DC Finishing Line

To make the production changes necessary to meet the proposed changes in discharge limits, a compliance schedule is required to allow Eagle to continue to operate while making the necessary modifications to its production process and facility. The compliance schedule will allow Eagle to decrease the twelve month rolling average of VOC emissions for the Line #2 to a level mentioned in the above paragraph.

The following schedule shall be used to assure compliance with, Kentucky Regulation 50:035, Permits, Section 7(2)(a) and the reasonable time period to allow Eagle to make changes mentioned above:

1. Issuance date of permit V-00-013.
2. Five (5) months from issuance of permit – Construction phase of production modification to be completed and the process ready for start up operation.
3. Upon start up the operation, twelve-month rolling average for the Line #2 shall be reset to zero.
4. Within sixty (60) days after achieving the maximum production rate at which the affected facilities will be operated but not later than 180 days after initial start-up of such facilities, the permittee shall conduct a performance demonstration on the affected facilities in accordance with Regulation 401 KAR 50:055, General compliance requirements.

Compliance with each of the scheduled events in this Section shall be certified to the Division for Air Quality within 1 week of or before the milestone dates given above.